

WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION
Community Nutrition Programs
Child and Adult Care Food Program

Guidance Memorandum 6C: For Child and Adult Care Food Program Sponsoring Organizations and Independent Centers (Child Care Component)

Topic: Enrollment

Date: June 2009

Enrollment Policy

The definition of enrollment in a child care center and the uniform application of enrollment criteria to all children are critical for agencies participating in the Child and Adult Care Food Program (CACFP). In the state of Wisconsin, meal reimbursement is based on the percentage of children enrolled in the free, reduced price, and non-needy eligibility categories. Therefore, an inconsistent application of enrollment criteria can result in serious financial sanctions and potential termination of an agency's eligibility to participate in the CACFP. In accordance with USDA guidance, a center is required to maintain its definition of enrollment for the entire fiscal year or receive written permission from DPI to change the enrollment definition if it is not consistent throughout the year.

The number of children enrolled in for-profit centers is critical as a condition for eligibility to participate in the CACFP, as well as the basis to claim monthly CACFP reimbursement. When enrollment is less than licensed capacity, the total number of children enrolled defines the number of children needed to meet the 25% threshold for Title XX beneficiaries or the 25% threshold for children in the free and reduced price eligibility categories.

An agency may establish its own enrollment policy for CACFP purposes, as long as it is reasonable, measurable, and can be uniformly applied when completing the CACFP Household Size-Income Record (HSIR) each month (see *Guidance Memorandum 1C*). A narrative description of the enrollment policy is a required part of the agency's CACFP contract. In accordance with Federal law and U.S. Department of Agriculture policy, the enrollment criteria established by an agency must not discriminate on the basis of race, color, national origin, sex, age, or disability. Since the agency's meal reimbursement amount depends on the number of children enrolled in the free, reduced price, and non-needy categories, the enrollment policy must be applied to each child regardless of her or his eligibility category. With the exception of CACFP "At-Risk" After School Hours Care sites (which use geographic area eligibility) and Emergency Shelters, each child served a meal that is claimed for CACFP reimbursement must be enrolled at your facility, and each enrolled child and infant must be counted in the center's total enrollment, whether they have been served meals claimed for reimbursement or not.

An agency may only exclude enrolled children from the reported CACFP monthly enrollment if a child's parent/guardian has provided a written statement certifying that they do not want their child to be enrolled in the CACFP at the agency. These children then must also be excluded from the meal counts claimed for reimbursement.

Three examples of reasonable and measurable enrollment criteria that can be uniformly applied when completing the CACFP HSIR are:

- 1) A child is considered enrolled for a given month if he or she has a completed and approved current enrollment form on file and is in attendance at least one day in the given month.
- 2) A child is considered enrolled if he or she has a completed and approved current enrollment form on file and has attended at least once in the past 3 months. After an attendance lapse of 3 months, the child is no longer included as free, reduced price, or non-needy on the HSIR.
- 3) A child is considered enrolled for a given month if he or she has a completed and approved current enrollment form on file and the center maintains a vacant opening in anticipation of the child's future attendance at the center.

While all of the examples above are acceptable, it has been DPI's experience that the most successful enrollment policies link enrollment to attendance on a monthly basis. Example #1 above would be easy to apply when completing the HSIR to determine the enrollment numbers to enter on monthly CACFP reimbursement claims. The agency would have all enrolled children listed on the HSIR and simply assure that a given child was in attendance at least once during the month to count him/her in the enrollment mix of free, reduced price, and non-needy categories reported on the reimbursement claim. This method also most accurately defines the enrollment mix of children being served in a given month. If your agency's enrollment policy includes children beyond the parameter of one month's attendance, a tracking system must be in place to properly account for these children.

An agency has discretion in deciding whether or not to include “drop-in” children within its enrollment policy. “Drop-in” is defined as a child whose parent/guardian needs sudden and immediate child care and only provides emergency contact information, not all required enrollment forms. If an agency provides care to “drop-in” children, this decision must be stated within the enrollment policy written in the CACFP contract and must be applied consistently to all “drop-in” children through the entire fiscal year.

Required Child Enrollment Form

The CACFP is primarily designed to provide nutritious meals to children enrolled for care in licensed or approved child care facilities. Parents/guardians of children in care fill out a Wisconsin Department of Children and Families (DCF) enrollment form that gives the child care center legal permission to provide care. This requirement can be found at DCF 251.04(6)(a) for licensed group child care centers. CACFP regulations at 7 CFR 226.15(e)(2) require that each center keep a record of a child's enrollment as well as copies of income eligibility forms used to determine eligibility for free or reduced-price meals.

Normal Days and Hours of Children in Care and Meals Normally Received

All independent and sponsored centers (except centers that have been previously approved by DPI as “at-risk” after school hours care sites, outside of school hours centers, or emergency shelters) must obtain information on each child's normal days and hours of care and the meals normally received while in care. This information must be updated annually and signed by a parent/guardian, no later than a year from the previous parent/guardian signature date.

There are two separate and distinct methods for agencies to comply with the federal CACFP requirement to collect normal days and hours in care and the meals normally received while in care:

- 1) Agencies may use the attached sample enrollment form (PI-6077, CACFP Enrollment Form) to collect the extra required enrollment information for the CACFP, their own form, or a combination of forms. Regardless of the form(s) used, all necessary information must be collected on a child-by-child basis, updated and signed annually by the parent or guardian. If the child is school age and attends the center both before and after school, the enrollment form must detail the child's normal hours in care both before and after school. The form must provide sufficient detail to allow the reviewer to determine the child's normal days and hours in care and the meals normally received while in care.
- 2) If the agency requires parents to sign their child(ren) in and out of the child care center each day, this practice will satisfy the requirements of the 2nd Interim CACFP Rule provided that:
 - a) the sign-in sheet or other sign-in method captures the time the children arrive at and depart from the center;
 - b) each day, the sign-in and sign-out times are signed, initialed, or entered electronically with an identifying code by a parent or guardian; and
 - c) a current DCF or comparable enrollment form for each child in care is annually updated and signed by the child's parent or guardian.

Group child care centers licensed by the DCF are required to maintain a current, accurate written record of the daily attendance and date of birth of each child for the length of time the child is enrolled in the center. The actual time of arrival and departure for each child shall be recorded if hours of arrival and departure vary among children [DCF 251.04(6)(b)]. These DCF mandated attendance records must fully comply with items 2a and 2b above if the agency intends to use these attendance records to comply with the normal days and hours of care and the meals normally received while in care requirement of the CACFP. In this latter case the center would still need to ensure that a current DCF or comparable enrollment form is on file for each child in care and that the enrollment form is annually updated and signed by the child's parent or guardian.

Head Start Centers Only

Children in Head Start centers must be enrolled for care, and the information on the child's normal days and hours in care and the meals normally received while in care must be captured on the enrollment form. However, because the majority of Head Start programs enroll children in a particular “session” (AM session, PM session, or all day) and provide the same meals to all children in that session, such Head Start centers are permitted to simply capture information on the enrollment form about which session the child will attend that year.

Although Head Start enrollments are considered to be in effect for two years, parents must confirm the enrollment information if their children participate for a second year. That will enable a CACFP monitor to establish that a particular child is still a morning, afternoon, or all day enrollee.

Additional Information for Sponsoring Organizations

Enrollment Policy

The HSIR must be used to track the agency's enrolled children each month in order to report the correct number of children by eligibility category (free, reduced price, or non-needy) on the monthly reimbursement claim. Sponsoring organizations of affiliated and unaffiliated centers must maintain a separate HSIR for each center. If a child attends more than one center within the given month, he/she must be counted on each of the attended centers' HSIRs, in accordance with your agency's stated enrollment policy. This is critical because claims may be rejected where attendance exceeds enrollment. Therefore, a child needs to be enrolled at the site where meals are consumed. If a child attends more than one site, the child must be enrolled at each site attended and the child must be included on the Household Size-Income Record for each site attended.

Annually Updated Child Enrollment Form

Both affiliated and unaffiliated child care centers are covered by the enrollment requirements to collect information on normal days and hours of care and the meals normally received while in care (unless a center has been previously approved by DPI as an "at-risk" after school hours care site, outside of school hours center, or emergency shelter). The enrollment form is a tool for determining the validity of meal counts in child care facilities. Although affiliated sites are owned and operated by their sponsors, the information on the enrollment form can nevertheless help the sponsor determine the quality and accuracy of the meal counting process in its facilities. In addition, requiring enrollment forms will be helpful to the DPI when it conducts an institution review and attempts to determine the validity of the sponsor's claims.